

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Dovid Akiva SHENKMAN

Case No. 24-30507

Filed: 11/25/2024

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 24, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:


*Code Section**Offense Description*

18 U.S.C. § 2252A(a)(2)
18 U.S.C. § 2252A(a)(5)(B)


Distribution and receipt of child pornography
Possession of child pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: November 25, 2024City and state: Detroit, Michigan


Complainant's signature

Lorin Allain, Special Agent (HSI)
Printed name and title


Judge's signature

Hon. Anthony P. Patti, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT

I, Lorin Allain, being first duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) in Detroit, Michigan, in the Eastern District of Michigan. I have been so employed since June 2008. I am also a graduate of the Criminal Investigator Training Program and the Immigration and Customs Enforcement Special Agent Training Program at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. Prior to my time with HSI, I was a student at Michigan State University in East Lansing, Michigan. In June of 2006, I obtained a bachelor's degree in criminal justice. While employed by HSI, I have investigated federal criminal violations related to child exploitation and child pornography. I have gained experience through training and everyday work relating to conducting these types of investigations.

2. This affidavit is made in support of a criminal complaint and arrest warrant for Dovid Akiva SHENKMAN DOB XX/XX/1985 for violations of 18

U.S.C. §§ 2252A(a)(2) (distribution and receipt of child pornography) and 2252A(a)(5)(B) (possession of child pornography).

3. This affidavit is based on my personal knowledge, experience, and training as well as on information obtained by me through investigative observations and conversations with other HSI agents and agents from other law enforcement agencies. This affidavit does not set forth every fact resulting from this investigation; rather, it contains a summary of the investigation to date for the limited purpose of establishing probable cause to obtain an arrest warrant for Dovid Akiva SHENKMAN.

PROBABLE CAUSE

4. On November 24, 2024, at approximately 4:45pm, Customs and Border Protection Officer (CBPO) Pineiro at the Ambassador Bridge Port of Entry (POE) in Detroit, Michigan encountered SHENKMAN while SHENKMAN was trying to enter the United States from Canada at the Ambassador Bridge. SHENKMAN refused to provide the password for his cell phone to law enforcement, but unlocked the phone with his thumb print, at which time CBP and HSI conducted a border search of the two cellphones in his possession. The border search of the phone found child pornography, as outlined below:

5. Agents located the Telegram Application on SHENKMAN's phone. Telegram is an encrypted social media application where users can send each other messages, images, and videos using the internet. Inside the Telegram Application on the cellphone, agents saw a conversation that contained exchanges of multiple videos of child pornography. The conversation was as follows:

SHENKMAN: Yo

Party B: Hey

SHENKMAN: This what your looking for

Party B: Yes!

SHENKMAN: What do you have

Party B: Give me a second. Gotta move it out of the hidden folder.

SHENKMAN: What folder is it in is it in a link send a link

SHENKMAN: ?

Party B: No it's not a linked folder

6. Party B then shared a video dated August 26, 9:42pm. This video appeared to depict a pre-pubescent, underage female licking an adult male penis as it ejaculated.

7. Party B then shared another video which appeared to depict the same pre-pubescent underage female as the previous video, being vaginally penetrated by what appeared to be an adult male penis.

8. Party B then shared three more videos that appear to meet the federal definition of child pornography.

9. The following exchange then occurred,

SHENKMAN: I have all the vids you sent in a mega link lol

Party B: oh ok. You probably have everything I have then.

SHENKMAN: lol maybe

SHENKMAN: I'm looking for even more messed up stuff

SHENKMAN: How are the knotty vids??

SHENKMAN: What else you got

10. SHENKMAN then shared a video dated September 1 4:00am, this video appeared to depict a pre-pubescent female licking an adult male penis as it ejaculated.

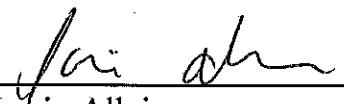
11. SHENKMAN then shared another video which appeared to depict a pre-pubescent female being prompted by another female to be vaginally penetrated by what appears to be a pre-pubescent males' penis.

12. SA Allain and SA Pejman Arab then attempted to interview SHENKMAN. But SHENKMAN requested an attorney, and the interview ceased.

CONCLUSION


13. I respectfully submit that there is probable cause to believe that Dovid Akiva SHENKMAN violated 18 U.S.C. §§ 2252A(a)(2) (distribution and receipt of child pornography) and 2252A(a)(5)(B) (possession of child pornography). I request that the Court authorize the issuance of a criminal complaint and arrest warrant for Dovid Akiva SHENKMAN.

Respectfully submitted,



Lorin Allain
Special Agent
Homeland Security Investigations

Sworn to before me in my presence and/or
by reliable electronic means.



Hon. Anthony P. Patti
United States Magistrate Judge

Dated: November 25, 2024